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IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF WASHINGTON

COMMUNITY ASSOCIATION FOR
RESTORATION OF THE
ENVIRONMENT, INC., a Washington
non-profit corporation; FRIENDS OF
TOPPENISH CREEK, a Washington non-
profit corporation; *and* CENTER FOR
FOOD SAFETY, a Washington, D.C. non-
profit corporation,

Plaintiffs,

v.

AUSTIN JACK DECOSTER, an individual,
DECOSTER ENTERPRISES, LLC, a
Delaware limited liability company,
AGRICUTURAL INVESTMENT-FUND
II, LLC, a Delaware limited liability
company, IDAHO AGRI INVESTMENTS,
LLC, an Idaho limited liability company,
IDAHO DAIRY HOLDINGS, LLC, an
Idaho limited liability company, DRY
CREEK DAIRIES, LLC, an Idaho limited
liability company, WASHIGNTON AGRI
INVESTMENTS, LLC, a Washington
limited liability company, WASHINGTON
DAIRY HOLDINGS, LLC, a Washington
limited liability company, DBD
WASHINGTON, LLC, a Washington

Case No. 1:19-CV-3110-TOR

PLAINTIFFS' REPLY IN SUPPORT OF
MOTION FOR AN AWARD OF
ATTORNEYS' AND EXPERT
WITNESSES' FEES AND COSTS (ECF
No. 184)

PLFS' REPLY IN SUPP. OF MOT.
FOR FEES AND COSTS (ECF No. 184)

1 limited liability company; and SMD, LLC, a
2 Washington limited liability company,
3 Defendants.
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1 Plaintiffs respectfully submit this Reply in Support of Plaintiffs' Motion for
 2 Fees and Costs (ECF No. 184). Defendants' opposition is remarkable for what it
 3 lacks: any specific, substantive arguments that Plaintiffs' attorneys were
 4 unreasonable in their time or rates. Instead, Defendants resort to conclusory and
 5 unsupported rhetoric, ignoring cases cited by Plaintiffs and inviting the Court to fly
 6 speck Plaintiffs' time records without any specific objections to any particular time
 7 entry, save for entries totaling just 106.5 out of Plaintiffs' 2,997.9 attorney hours
 8 (*i.e.*, 3.5% of total hours). Defendants bore the "burden of rebuttal that requires
 9 submission of evidence to the district court challenging the accuracy or
 10 reasonableness of the hours charged or facts asserted by the prevailing party[.]"
 11 *Gates v. Deukmejian*, 987 F.2d 1392, 1397-98 (9th Cir. 1992) (citation omitted).
 12 Defendants come up far short, and the Court should grant Plaintiffs' Motion as
 13 submitted, together with further "fees on fees," as detailed in **Appendix A** hereto.

14 **I. PLAINTIFFS PREVAILED, AND NO SPECIAL CIRCUMSTANCES**
 15 **WARRANT AGAINST A FEES AND COST AWARD**

16 While Plaintiffs are undisputedly the prevailing party, Defendants instead
 17 appear to argue that "special circumstances" exist to such a degree that Plaintiffs'
 18 demand should be reduced by over **80%** to \$350,000. ECF No. 186, "Fee Opp." at
 19 6-12. To prop up this argument, Defendants rely on a concurrence from a Tenth
 20 Circuit case, failing to provide any relevant citation to RCRA fee decisions in this

1 Circuit or in this District. *Id.* at 7 (citing *Browder v. City of Moab*, 427 F.3d 717
2 (10th Cir. 2005)). Nothing in *Browder* suggests the Court has discretion to simply
3 deny the instant motion, and *Browder* explicitly acknowledges the Supreme
4 Court’s instruction in *Hensley* that a prevailing party “should *ordinarily* recover an
5 attorney’s fee unless special circumstances would render such an award unjust.”
6 *Browder*, 427 F.3d at 721 (emphasis in original).

7 The controlling precedent is *St. John’s Organic Farm v. Gem Cnty.*
8 *Mosquito Abatement Dist.*, 574 F.3d 1054, 1064 (9th Cir. 2009), in which the
9 Ninth Circuit held that it is “the rule rather than the exception” that fees and costs
10 are awarded to the prevailing party. Only “special circumstances” warrant a
11 departure from the rule. *See also Cmty Ass’n for Rest. of the Env’t v. Cow Palace,*
12 *LLC*, 13-CV-3016-TOR, 2016 U.S. Dist. LEXIS 92110, at *9-10 (E.D. Wash. Jan.
13 12, 2016) (applying holding of *St. John’s Organic Farm* to RCRA fee motion).

14 Confusingly, Defendants claim that “this doctrine does not apply,” but in the
15 next sentence argue the Court should reduce Plaintiffs’ award to just \$350,000,
16 apparently based on the same doctrine. Fee Opp. at 9-10. At no point do
17 Defendants identify any specific “special circumstances” that would warrant a
18 departure from the rule. Thus, the “lodestar” analysis should apply giving due
19 “defer[ence] to the winning lawyer’s professional judgment as to how much time”
20 was required. *Ryan v. Editions Ltd. W., Inc.*, 786 F.3d 754, 763 (9th Cir. 2015).

1 **II. NON-FORUM RATES SHOULD BE AWARDED**

2 Defendants next weakly challenge the hourly rates that Plaintiffs request,
3 making five closely related arguments, each addressed in turn:

4 *First*, Defendants claim Plaintiffs did not carry their burden to show that
5 non-forum rates should be utilized. Defendants proffer no contrary evidence that
6 other attorneys in this forum would have accepted representation on a contingency
7 fee basis. Defendants muster only bare argument, devoid of factual or legal
8 citation. *See Fee Opp.* at 13-14.

9 Plaintiffs carry their burden for non-forum rates by showing that local
10 counsel is unavailable, either because of unwillingness or inability to perform due
11 to lack of experience, expertise, or specialization. *See Barjon v. Dalton*, 134 F.3d
12 496, 500 (9th Cir. 1997). Defendants do not and cannot refute that the *only*
13 attorneys bringing RCRA litigation against CAFOs in Washington have been the
14 undersigned counsel. ECF No. 184 at 14.

15 Defendants claim that Friends of Toppenish Creek did not attempt to find
16 other local attorneys. ECF 186 at 13. Ms. Mendoza's declaration plainly states that
17 "[n]o other law firms in Washington have been willing to even represent us, let
18 alone take the personal and financial risks" that Mr. Tebbutt and Plaintiffs'
19 attorneys have shouldered. *See* ECF No. 184-6 ¶ 11. In the eight years since *Cow*

1 *Palace*, not *one* other Washington law firm, or outside Washington firm for that
2 matter, has taken up a CAFO enforcement action in the state.

3 Defendants also misrepresent the declarations of Messrs. Tebbutt and
4 Marshall in arguing that there are attorneys with a RCRA environmental specialty
5 in the forum who would litigate these cases. *See* Fee Opp. at 13-14. Mr. Tebbutt
6 states that “no other firms in Washington” would agree to this type of enforcement
7 action “*without* the expertise of my firm” also being involved. ECF No. 184-1 ¶ 35
8 (emphasis added). Mr. Marshall similarly declares that no other law firms in
9 Washington, including his own, would take on a RCRA CAFO enforcement action
10 if it didn’t involve Tebbutt’s firm. ECF No. 184-4. Notably absent from
11 Defendants’ submissions are declarations from local firms claiming *they* would
12 agree to represent Plaintiffs on the same terms that counsel does.

13 Finally, Defendants conflate the issue of non-forum rates and Plaintiffs’
14 obligation to support their claimed forum rates. Fee Opp. at 13 (appearing to argue
15 that Plaintiffs’ expert witness, Mr. Kampmeier, makes an opinion only as to forum
16 rates). To be clear, Plaintiffs seek non-forum rates for Tebbutt and Snyder based on
17 their experience, skill, and expertise, as Appendix A to ECF No. 184 states
18 (national non-forum rate of \$735 and \$588/hour, respectively). Mr. Kampmeier, on
19 the other hand, opines that Mr. Tebbutt could achieve a *forum* rate of \$640/hour,
20 and Mr. Snyder a forum rate of \$512/hour. ECF No. 184-7 ¶¶ 18-19. Mr.

1 Kampmeier also recognizes, in the next sentence, that “Mr. Tebbutt could seek
2 national rates instead of forum rates given the nature and scope of his practice and
3 professional expertise.” *Id.* ¶ 18. Mr. Kampmeier’s declaration thus supports both
4 the forum and non-forum rates that Plaintiffs’ request.

5 ***Second***, in contesting the forum rates sought by Plaintiffs’ counsel, Fee Opp.
6 at 14, Defendants rely upon the declaration of Mr. Kevan Montoya, ECF No. 187,
7 an attorney with a small “general practice” that, according to the firm’s website,
8 focuses on personal injury matters: “car accidents, personal injury, traumatic brain
9 injury, truck accidents, wrongful death.” While Mr. Montoya opines that Plaintiffs’
10 counsel’s hourly rates are too high, conspicuously absent from Mr. Montoya’s
11 declaration is any indication that he practices complex environmental law in
12 federal court, let alone RCRA citizen suits. Mr. Montoya provides no evidentiary
13 basis for his opinions beyond “occasionally hear[ing] attorneys arguing about issue
14 of fees,” “occasionally check[ing] with other attorneys who practice in Yakima
15 County,” and looking at “judicial opinions and pleadings in cases in which” he was
16 aware other attorneys had been awarded fees. *Id.* ¶ 3. No data points, reported
17 decisions, representation agreements, or other evidence is provided.

18 Unsurprisingly, Mr. Montoya nakedly opines that Plaintiffs’ counsel should
19 be awarded substantially lower hourly rates than requested and lower than this
20 Court’s recent awards. ECF No. 184 at 16 (citing a case in which this Court

1 adopted the USAO Attorney's Fees Matrix consistent with rates sought here).
2 Indeed, Mr. Montoya's five-year increment analysis results in lower hourly rates
3 than the Court awarded to Tebbutt, Snyder, and Marshall in the *Cow Palace* fee
4 petition over seven years ago, a case Mr. Montoya has apparently not read.

5 Further undercutting Mr. Montoya's opinions are the hourly rates that
6 Defendants' own attorneys charged. As the Court is aware, Defendants were
7 represented by a host of national law firms, which speaks to the degree of skill,
8 competency, and expertise needed to litigate this matter. Defendants' counsel have
9 provided their rates in response to earlier subpoenas. Second Tebbutt Decl. ¶ 4. As
10 Defendants challenged the reasonableness of Plaintiffs' rates, these rates are now
11 relevant. *Real v. Cont'l Grp., Inc.*, 116 F.R.D. 211, 213 (N.D. Cal. 1986)
12 ("Defendant's counsel's hourly rate is similarly relevant to a determination of
13 reasonable fees under *Hensley*."). The reported rates are set forth in **Appendix B**
14 hereto and explained further in paragraph 4 of the Second Tebbutt Declaration.
15 Sidley Austin refused to fully comply with the subpoena, but lead counsel Franke
16 Volpe represented that his rate for this case was higher than even the alternative
17 \$735/hour national rate that Plaintiffs request for Mr. Tebbutt. Second Tebbutt
18 Decl. ¶ 4. The rates for Messrs. Marten (\$890), Volpe (\$735+), Fite (\$675), Fried
19 (\$625), Monahan (\$575), Krabill (\$575), and Fielding (\$575) comport with or even
20 exceed Plaintiffs' requested rates and are *significantly* higher than the speculative

1 forum rates provided in Mr. Montoya’s declaration—where an attorney with 16
2 years of experience, like Mr. Krabill, should charge just \$260-310/hour. ECF No.
3 187 at 7. Defendants’ own rates thus substantially undercut their position about the
4 appropriateness of rates for Plaintiffs’ counsel.

5 ***Third***, Defendants provide the Court with the settlement offer made in
6 accordance with the Consent Decree before pursuing this fee litigation. ECF No.
7 188-1. They ask the Court to “consider” that evidence in evaluating a proper
8 hourly rate. Importantly, those rates were intended to adduce a settlement on fees
9 and costs under FRE 408 and are not the rates that Plaintiffs now seek following
10 consulting with expert witnesses and reviewing recent cases on forum rates. The
11 email Mr. Tebbutt sent to Defendants makes clear that Plaintiffs “reserve the right
12 to amend this documentation should the defendants require a full fee petition to the
13 Court[,]” which Defendants did when they declined Plaintiffs’ settlement offer.
14 The Court should not rely upon a settlement offer in an effort to avoid motion
15 practice as evidence for reasonable hourly rates. Fed. R. Evid. 408.

16 ***Fourth***, Defendants make omnibus and conclusory arguments about the first
17 three *Kerr* factors, arguing that this case was not complex but rather a simple,
18 straightforward discovery and document review matter. Fee Opp. at 16. The
19 undersigned are unaware of any “discovery case” that involves veil piercing, ten
20 different defendant shell organizations all sharing finances and the degree to which

1 they “contribute” to the handling of waste under RCRA, expert reports totaling
2 hundreds of pages, fact and expert depositions, discovery disputes, spoliation of
3 evidence, and failure to adhere to the basic fundamentals of the civil rules (such as
4 arguing that initial disclosures are not required), and extensive on-the-ground
5 investigations. While *Cow Palace* established the legal principle that manure may
6 constitute a solid waste under RCRA, each imminent and substantial endangerment
7 case requires citizen-plaintiffs to satisfy a high burden of proving, *inter alia*, (1)
8 that defendants treated their manure as a wasteful byproduct; (2) that the disposal
9 or discarding of that manure caused and continues to cause environmental damage;
10 and (3) that damage presents an endangerment to human health and the
11 environment. Indeed, had this been a mere “discovery” case, one must wonder why
12 Defendants retained expensive national law firms to defend them.

13 ***Fifth***, Defendants proffer Mr. Stephen—an agronomist and eventual expert
14 witness—to opine about how the Consent Decree duplicates the requirements of
15 Defendants’ CAFO permits. ECF No. 189. Nowhere does Mr. Stephen present a
16 specific comparison of the requirements of the Decree versus the CAFO Permit, let
17 alone cite to any specific portion of the CAFO Permit. Instead, Mr. Stephen
18 devotes one page of his declaration to the areas in which he believes the CAFO
19 permit is the same as the Consent Decree. ECF No. 189 at 10-11. Mr. Stephen’s
20 once again “hypothetical musings” are vacuous, as shown by Mr. Erickson’s

1 comparison of permit versus Consent Decree requirements. Declaration of David
2 Erickson (“Erickson Decl.”) ¶ 7; *see Cmty. Ass’n for Restoration of the Env’t v.*
3 *Cow Palace, Ltd. Liab. Co.*, 80 F. Supp. 3d 1180, 1225 (E.D. Wash. 2015). The
4 Consent Decree obligates Defendants to undertake significantly more work in an
5 accountable manner than what the CAFO Permit requires, and the terms of the
6 Decree are enforceable in this Court and subject to contempt proceedings.

7 **III. PLAINTIFFS’ TIME WAS NEITHER EXCESSIVE NOR**
8 **UNNECESSARY, NOR WERE PLAINTIFFS’ EXPERT COSTS.**

9 The final section of the fee opposition takes issue with three points: that Ms.
10 Loda and Ms. Steiner spent 40.3 and 24.2 hours preparing unfiled summary
11 judgment and *Daubert* motions, respectively; that Ms. Steiner spent a number of
12 time entries researching RCRA liability; and that David Erickson’s services were
13 “excessive.” Fee Opp. at 17-18.

14 The fact that Ms. Loda and Ms. Steiner’s motions were not filed is
15 irrelevant. The Ninth Circuit has consistently allowed all hours to be awarded even
16 where only some claims were successful, where either the facts or law are in common.
17 *See, e.g., Manhart v. City of Los Angeles*, 652 F.2d 904, 909 (9th Cir. 1981) (awarding
18 fees for all hours spent in pursuit of ultimate goal, despite dismissal of several claims).
19 Those motions were not even unsuccessful; they were merely made moot by the
20 settlement. Given Defendants’ pattern of repeatedly impeding settlement efforts,

1 which Defendants never contested, Plaintiffs had no choice but to prepare
2 diligently for trial. Second Tebbutt Decl. ¶ 5; *see also* ECF No. 184-1, ¶¶ 19, 29
3 (“First Tebbutt Decl.”). In addition, Ms. Steiner’s time researching RCRA liability
4 helped secure Mr. DeCoster’s ultimate responsibility and was essential to
5 Plaintiffs’ prosecution of the case. Second Tebbutt Decl. ¶ 6. That time, too, should
6 be compensated fully.

7 Finally, Plaintiffs have already detailed the indispensable nature of Mr.
8 Erickson’s services. *See* First Tebbutt Decl. ¶¶ 47-49. Because of Defendants’
9 cursory challenge, however, Plaintiffs invite the Court to review his expert report.
10 Erickson Decl. Ex. 3. The fact that it was not filed, unlike in *Cow Palace*, is, as
11 with Ms. Loda and Ms. Steiner’s motions, irrelevant; it was nonetheless essential
12 to prosecution, trial preparation, and settlement. Second Tebbutt Decl. ¶ 9.

13 For all these reasons, Plaintiffs should be awarded the full fees and costs of
14 \$1,800,662 (or higher if out-of-forum rates are awarded) as detailed in **Appendix**
15 **A** hereto, from which \$350,000 will be subtracted, as well as any further fees and
16 costs incurred after the date of this filing.

17 Respectfully submitted this 25th Day of October, 2023.

18 /s/ Charles M. Tebbutt

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CERTIFICATE OF SERVICE

I hereby certify that on October 25, 2023, I electronically served the foregoing document via email to the following counsel of record:

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Appendix A - Fees and Costs, Supplemental and Total

Table 1. Supplemental Fee Hours		
Attorney	Firm	Hours
Charles M. Tebbutt	LOCMT	32.8
Daniel C. Snyder	PJ	19.8
Jonathan D. Frohnmayer	LOCMT	76.6
Andrea Rodgers	LOAKR	1.0
Amy van Saun	CFS	4.0
Blythe Chandler	TM	2.3
Subtotal		136.5
Secretary	Firm	Hours
Marisela Taylor	LOCMT	0.50

Table 2. Supplemental Costs	
Expert Witness	Cost
Dave Erickson/WET	\$1,125
Litigation: Research	Cost
Law Offices of CMT	\$562
Subtotal	\$1,687

Appendix A - Fees and Costs, Supplemental and Total (Cont.)

Table 3. Total Fees*										
A.	B.	C.	D.	E.	F.	G.	H.	I.	J.	K.
Attorney	Firm	Years Exp.	USAO Rate 2020-21	USAO Rate 2023-24	USAO Rate 2023-24 (Locality Adjusted)	Rate Requested	Alt. Rate Requested (National)	Laffey Rate 2023-24	Hours	Total Due
Charles M. Tebbutt	LOCMT	35	\$665	\$735	\$640	\$640	\$735	\$1,057	827.5	\$529,600
Daniel C. Snyder	LOCMT/PJ	13	\$532	\$588	\$512	\$512	\$588	\$878	606.4	\$310,477
Jonathan D. Frohnmayer	LOCMT	10	\$452	\$499	\$435	\$425		\$777	443.6	\$188,530
Parker Jones	LOCMT	4	\$380	\$420	\$366	\$330		\$437	1,034.3	\$341,319
Andrea Rodgers	LOAKR	21	\$621	\$686	\$598	\$590		\$1,057	13.5	\$7,965
Amy van Saun	CFS	12	\$532	\$588	\$512	\$490		\$878	20.6	\$10,094
Jenny Loda	CFS	11	\$532	\$588	\$512	\$480		\$878	43.7	\$20,976
Amanda Steiner	TM	25	\$621	\$686	\$598	\$590		\$1,057	112.0	\$66,080
Toby Marshall	TM	21	\$621	\$686	\$598	\$590		\$1,057	5.8	\$3,422
Blythe Chandler	TM	13	\$532	\$588	\$512	\$512		\$878	7.6	\$3,891
Eden B. Nordby	TM	2	\$333	\$368	\$321	\$280		\$437	19.4	\$5,432
Subtotal									3,134.4	\$1,487,786
Paralegal/Secretary	Firm	Years Exp.				Rate Requested		Laffey Rate 2023-24	Hours	Total Due
Bradford Kinsey	TM	20+				\$125			2.7	\$338
Jessica A. Langsted	TM	6				\$150		\$239	15.3	\$2,295
Lisa Reed	PJ	20+				\$195		\$239	14.3	\$2,789
Marisela Taylor	LOCMT	20+				\$150			12.3	\$1,845
Subtotal									44.6	\$7,266
Total - Fees									3,179.0	\$1,495,052

* Column explanations in Paragraph 13 of first Declaration of Charles M. Tebbutt, ECF No. 184-1, apply here. Total Due (Column K) based on Column G rates.

Appendix A - Fees and Costs, Supplemental and Total (Cont.)

Table 4. Total Costs	
Expert Witness - Science	Total Cost
Dave Erickson/WET	\$222,914
Michael Russelle	\$22,300
Keeve Nachman	\$3,600
Subtotal	\$248,814
Litigation: Court/service, Postage, Printing, PACER, Research, etc. & Consulting	Total Cost
Law Offices of CMT	\$27,056
Terrell Marshall	\$15,816
Paul Kampmeier	\$13,924
Subtotal	\$56,796
Total - Costs	\$305,610

Table 5. Grand Total	
Total - Fees and Costs	\$1,800,662
Amount Paid Previously	\$350,000
Total Due Now	\$1,450,662

Appendix B: Defendants' Counsel Hourly Rates

Attorney	Firm	Bar Admission Year	State	Years of Practice	Year(s) of Rep. of Defs.	Hourly Rate
Brendan Monahan	Stokes Lawrence	1992	WA	31	2022-23	\$575
Kent Krabill	Lynn Pinker Hurst	2007	TX	16	2019	\$575
Jeremy Fielding	Lynn Pinker Hurst	2003	TX	20	2019	\$575
Russell Herman	Lynn Pinker Hurst	2012	TX	11	2019	\$410
Michael Kalis	Lynn Pinker Hurst	2014	TX	9	2019	\$390
Brad Marten	Marten Law	1981	DC	42	2021-22	\$890
Stephen Odell	Marten Law	1990	OR	33	2020-21	\$435
Jeff Kray	Marten Law	1992	WA	31	2019-22	\$495/\$625
Jessica Ferrell	Marten Law	2005	WA	18	2021	\$410
Merissa Moeller	Marten Law	2015	OR	8	2019	\$315
Alexa Shasteen	Marten Law	2015	OR	8	2020	\$315
Michael Smith*	Marten Law	2023	OR	<1	2020	\$280
Ana Nina	Marten Law	2021	WA	2	2021	\$355
Jack Ross	Marten Law	2020	WA	3	2021	\$345
Kameron Schroeder*	Marten Law	pending	OR	<1	2022	\$405
Zachary Zahner*	Marten Law	pending	DC	<1	2022	\$405
Lawson Fite	Marten Law	2005	OR	18	2019-22	\$675
Sara Cloon	Marten Law	2017	WA	6	2021-22	\$465
Jennifer Hammitt	Marten Law	2019	WA	4	2019-20	\$385
Frank Volpe	Sidley Austin	1998	DC	25	2022-23	\$735+
Jacquelyn Fradette	Sidley Austin	2016	DC	7	2022-23	-
Christopher Eiswerth	Sidley Austin	2015	DC	8	2022-23	-
Robin Wechkin	Sidley Austin	1995	WA	28	2022-23	-
John Jay Carroll	Halverson NW	1987	WA	36	2022-23	\$425
Gary Baise	Olsson Frank	1974	DC	49	2022-23	\$375
Stewart Fried	Olsson Frank	1998	DC	25	2022-23	\$625

* Summer Associate at time